From: "O'Keefe, Jeff (CDPH-DDWEM)" <Jeff.OKeefe@cdph.ca.gov>
To: Frederick Schauffler/R9/USEPA/US@EPA
Cc: "Orr, Shu-Fang (CDPH-DDWEM)" <Shu-Fang.Orr@cdph.ca.gov>, "Souza, Kurt (CDPH-DDWEM-DWFO)" <Kurt.Souza@cdph.ca.gov>
Date: 09/01/2011 02:04 PM
Subject: OMEGA Cr 6 Treat Goals

Fred,
I am responding to your phone message. I know you are requesting CDPH input to help you develop a clean up standard for Cr 6 in your Omega Record of Decision.
Once a water system is identified as the recipient of this water, CDPH will begin our permitting process for these sources and treatment facilities. During this process we will require an engineering report prepared in accordance with CDPH Policy Memo 97-005: Guidance for Direct Domestic Use of Extremely Impaired Sources. We provided additional guidance in our prior letter to EPA on November 10, 2010 (unsigned copy attached but Lynda should have an original). Here is an excerpt of treatment requirements:

> *In particular, the treatment goals for a project subject to the requirements of CDPH Policy Memo 97-005 are described as follows:*
>
> > *All treatment processes used must be optimized to reliably produce water that contains the lowest concentration of contaminants feasible at all times... Any water from other sources that is available for blending prior to entry into the distribution system should be used to provide an additional safety factor. (CDPH Policy Memo 97-005)*
>
> *This objective underscores a key principle of the CDPH policy: the concentration of all constituents of concern must be minimized, regulatory limits (i.e., MCLs) notwithstanding. Therefore, the treatment goals required by CDPH may be lower than the drinking water discharge limits presented in Table 3-6 of the FS. In particular, the treatment goal for chromium is likely to be substantially lower than the maximum contaminant level (MCL) for total chromium.*

To further clarify this requirement; if any extraction well produces total chromium above the MCL of 50 ppb, then removal treatment would need to be optimized to produce water that achieves the lowest concentration feasible. Based on ongoing research conducted at Glendale Water and Power, CDPH has confidence that technology is available that can achieve less than 5 ppb consistently.
I hope this answer is satisfactory for your needs. If you wish to discuss further, Kurt or I are available today until 3pm or Tuesday afternoon.